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Attorneys for Defendant  
TESLA, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Caleb Mendoza; Eduardo Mendoza and  
Maria Mendoza; and Estate of Genesis  
Giovanni Mendoza Martinez, by and  
through its personal representatives,  
Eduardo and Maria Elena Mendoza,

Plaintiffs,

vs.

Tesla, Inc., a Delaware corporation, and  
DOES 1 through 100, inclusive,

Defendants.

Case No. 5:24-cv-08738

(Removed from Contra Costa County Superior  
Court – Case No. C24-02690)

**DECLARATION OF TREVOR C. ZEILER  
IN SUPPORT OF DEFENDANT TESLA,  
INC.’S NOTICE OF REMOVAL TO THE  
UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF  
CALIFORNIA UNDER 28 U.S.C. § 1332,  
DIVERSITY JURISDICTION**

Action Filed: October 9, 2024

I, Trevor C. Zeiler, declare as follows:

1. I am an attorney admitted to practice before all courts of the State of California and the Northern District Court. I am an attorney employed by Nelson Mullins Riley & Scarborough LLP, attorneys of record for defendant Tesla, Inc. (Tesla). I have knowledge of all the facts set forth herein,

1 and if called upon to do so by the court, could and would testify competently thereto.

2 2. I make this declaration in support of Tesla's Notice of Removal to the United States  
3 District Court for the Northern District of California.

4 3. Attached hereto as **Exhibit "A"** is a true and correct copy of Plaintiffs' Complaint  
5 entitled *Mendoza, et al. v. Tesla, Inc.*, Case No. C24-02690, and the Summons served on Tesla.

6 4. Attached hereto as **Exhibit "B"** is a true and correct copy of the proof of service of  
7 the Summons and Complaint indicating service was made on Tesla, the only named defendant,  
8 through its designated agent for service of process, CT Corporation System on November 4, 2024.

9 5. Attached hereto as **Exhibit "C"** is a true and correct copy of Tesla's Answer to  
10 Plaintiffs' Complaint submitted for filing on December 4, 2024, in the Contra Costa County  
11 Superior Court.

12 6. Attached hereto as **Exhibit "D"** is a true and correct copy of the Statement of  
13 Information and business entity detail for Tesla, Inc. obtained from the official website for the  
14 California Secretary of State on December 2, 2024. The Statement of Information indicates that  
15 Tesla, Inc. is a corporation incorporated in Texas, with its principal office in Texas, and its Chief  
16 Executive Officer and Chief Financial Officer are based out of Texas.

17 7. Attached here to as **Exhibit "E"** is a true and correct copy of Tesla's Securities and  
18 Exchange Act Commission Form 8-K, which was filed December 1, 2021, and states: "On  
19 December 1, 2021, Tesla, Inc. relocated its corporate headquarters to Gigafactory Texas at 13101  
20 Harold Green Road, Austin, Texas 78725." Upon information and belief, 13101 Harold Green Road,  
21 Austin, Texas has since been renamed to 1 Tesla Road in Austin, Texas.

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**PROOF OF SERVICE**  
**(CCP § 1013(a) and 2015.5)**

I, the undersigned, am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; am employed with Nelson Mullins Riley & Scarborough LLP and my business address is 19191 South Vermont Avenue, Suite 900, Torrance, CA 90502.

On December 4, 2024 I served the foregoing document entitled **DECLARATION OF TREVOR C. ZEILER IN SUPPORT OF DEFENDANT TESLA, INC.'S NOTICE OF REMOVAL TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1332, DIVERSITY JURISDICTION** on all the appearing and/or interested parties in this action by placing ☐ the original ☒ a true copy thereof as follows:

☒ [by **MAIL**] - I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing this affidavit.

☐ [by **FEDERAL EXPRESS**] - I am readily familiar with the firm's practice for collection and processing of correspondence for overnight delivery by Federal Express. Under that practice such correspondence will be deposited at a facility or pick-up box regularly maintained by Federal Express for receipt on the same day in the ordinary course of business with delivery fees paid or provided for in accordance with ordinary business practices.

☒ [by **ELECTRONIC SUBMISSION**] - By transmitting such document(s) electronically from my e-mail address at Nelson Mullins Riley & Scarborough LLP to the person(s) at the electronic mail addresses listed above pursuant to Emergency Rule 12 and/or the agreement of the parties.

☐ [by **ELECTRONIC SUBMISSION**] - I served the above listed document(s) described via the United States District Court's Electronic Filing Program on the designated recipients via electronic transmission through the CM/ECF system on the Court's website. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document(s). Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities.

☐ [by **PERSONAL SERVICE**] - I caused to be delivered by messenger such envelope(s) by hand to the office of the addressee(s). Such messenger is over the age of eighteen years and not a party to the within action and employed with [attorney service].

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed December 4, 2024 at Whittier, California.

ELIZABETH VELASQUEZ  
Print Name

By: \_\_\_\_\_

  
Signature

**SERVICE/MAILING LIST**

**Caleb Mendoza, et al. v. Tesla, Inc.**

Contra Costa County Superior Court Case No.: C24-02690

<b>SINGLETON SCHREIBER, LLP</b> Brett J. Schreiber, Esq. Srinvas Hanumadass, Esq. Carmela Birnbaum, Esq. 591 Camino de la Reina, Suite 1025 San Diego, CA 92108	<b>ATTORNEYS FOR PLAINTIFFS</b>  Tel: (619) 771-3473 Fax: (619) 255-1515 Email: <a href="mailto:bschreiber@singletonschreiber.com">bschreiber@singletonschreiber.com</a> <a href="mailto:vas@singletonschreiber.com">vas@singletonschreiber.com</a> <a href="mailto:cbirnbaum@singletonschreiber.com">cbirnbaum@singletonschreiber.com</a>
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